

CERTIFICATE OF SERVICE

I, Michelle A. Parfitt, hereby certify that I caused a copy of the foregoing Notice of Supplemental Authority Related to Defendant Personal Care Product Council's Motion for Summary Judgment to be filed electronically via the court's electronic filing system the 11th day of August, 2020. Those attorneys who are registered with the court's electronic filing system may access these filings through the court's system, and notice of these filings will be sent to these parties by operation of the court's electronic filing system.

Dated: August 11, 2020

/s/ Michelle A. Parfitt
Michelle A. Parfitt